

**IN THE UNITED STATES DISTRICT COURT
FOR THE WESTERN DISTRICT OF TEXAS
AUSTIN DIVISION**

KENTREZ GRANT,

Plaintiff,

v.

DELTA AIR LINES, INC.,

Defendant.

§
§
§
§
§
§
§
§
§

CIVIL ACTION NO. 1:25-cv-00154-RP

DEFENDANT DELTA AIR LINES, INC.’S INITIAL DISCLOSURES

Pursuant to Federal Rule of Civil Procedure Rule 26(a)(1), Defendant Delta Air Lines, Inc. (“Delta”), by and through its attorneys, Littler Mendelson P.C., hereby provides the following initial disclosures based upon the information reasonably available at this time. Defendant reserves the right to amend, supplement, or modify these disclosures in future discovery responses and/or as required by Rule 26(e) of the Federal Rules of Civil Procedure as additional investigation and discovery are conducted that reveal new facts or provide new significance to known information not presently deemed responsive. Defendant further reserves the right to call any witness or present any exhibit or item at trial not listed here but identified by Plaintiff Kentrez Grant (“Plaintiff”) or Defendant through discovery, investigation, or otherwise during this action.

1. The correct names of the parties to the action

Upon information and belief, Defendant believes that Kentrez Grant and Delta Air Lines, Inc. are the correct names of the parties to the action.

2. Any potential parties to the action

None.

3. **Persons having knowledge of facts relevant to the claims or defenses**

| Witness | Information |
|---|--|
| Plaintiff Kentrez Grant 4516 Burleson Road, #17848 Austin, Texas 78744 | Plaintiff is expected to have knowledge of the claims and alleged damages asserted in this matter. |
| Olive Brown Field Director ACS, Southcentral Region c/o Celeste R. Yeager Littler Mendelson 2001 Ross Ave., Suite 1500 Dallas, TX 75201 | Ms. Brown is expected to have knowledge concerning Plaintiff's employment. |
| Christopher (CJ) Joseph Operations Service Manager c/o Celeste R. Yeager Littler Mendelson 2001 Ross Ave., Suite 1500 Dallas, TX 75201 | Mr. Joseph is expected to have knowledge concerning Plaintiff's employment. |
| Janet Montiy Above Wing Operations Service Manager c/o Celeste R. Yeager Littler Mendelson 2001 Ross Ave., Suite 1500 Dallas, TX 75201 | Ms. Montiy is expected to have knowledge concerning Plaintiff's employment. |
| Brandon Cummings Below Wing Operations Service Manager c/o Celeste R. Yeager Littler Mendelson 2001 Ross Ave., Suite 1500 Dallas, TX 75201 | Mr. Cummings is expected to have knowledge concerning Plaintiff's employment. |
| Dennis Garza Station Manager c/o Celeste R. Yeager Littler Mendelson 2001 Ross Ave., Suite 1500 Dallas, TX 75201 | Mr. Garza is expected to have knowledge concerning Plaintiff's employment. |

| | |
|---|--|
| Jose Linares Aircraft Lead Agent c/o Celeste R. Yeager Littler Mendelson 2001 Ross Ave., Suite 1500 Dallas, TX 75201 | Mr. Linares is expected to have knowledge concerning Plaintiff's employment. |
| William Mann Aircraft Lead Agent c/o Celeste R. Yeager Littler Mendelson 2001 Ross Ave., Suite 1500 Dallas, TX 75201 | Mr. Mann is expected to have knowledge concerning Plaintiff's employment. |
| David Jimenez c/o Celeste R. Yeager Littler Mendelson 2001 Ross Ave., Suite 1500 Dallas, TX 75201 | Mr. Jimenez is expected to have knowledge concerning Plaintiff's employment. |
| Any individuals identified by Plaintiff's Rule 26 disclosures and his Original Complaint "Witness List." | |
| Custodians of records for Plaintiff's prior and subsequent employers. | |
| Custodians of records for Plaintiff's medical records. | |

Defendant will supplement this list as investigation and discovery reveal the existence of additional witnesses.

4. Relevant documents, data compilations, and tangible things in the possession, custody, or control of Defendant.

Pursuant to Rule 26(a)(1)(A)(ii), Defendant identifies the below documents, data, compilations, and tangible things in its possession, custody, or control that it may use to support its claims and defenses:

- a. All pleadings on file with the Court in connection with this action;

- b. Non-privileged documents relating to Plaintiff's employment with Delta, including his personnel file, attendance, and payroll records;
- c. Non-privileged documents relating to any investigation of complaints made by or against Plaintiff;
- d. Non-privileged documents relating to any request(s) for accommodation made by Plaintiff;
- e. Non-privileged documents relating to the Plaintiff's termination by Delta;
- f. Relevant Delta policies and procedures;
- g. Non-privileged communications, including electronic communications, regarding Plaintiff's employment, Plaintiff's discipline, Plaintiff's alleged discrimination, harassment, failure to accommodate, retaliation, and Plaintiff's termination; and
- h. Non-privileged documents relating to Plaintiff's alleged damages, including compensation and benefits documents.

Defendant may supplement this list as the investigation and discovery reveal the existence of other documents.

5. A compilation of any category of damages claimed by the disclosing party.

Defendant does not seek damages from Plaintiff, other than prevailing party attorneys' fees and costs.

6. Any insurance agreement which may be used for indemnification or reimbursement purposes.

Pursuant to Federal Rule of Civil Procedure 26(a)(1)(A)(iv), Defendant responds that it has EPLI coverage with a high deductible. However, based upon the facts alleged by Plaintiff, Delta does not believe that the policy could be implicated in this action.

In accordance with Federal Rule of Civil Procedure 26(e), Defendant will supplement or correct the above disclosures to include information subsequently acquired if, based on that information, it is determined that the above-disclosed information is incomplete or incorrect in some material respect and if the additional or correct information is not otherwise made known to Defendant.

Respectfully submitted,

/s/ Celeste R. Yeager

Celeste R. Yeager
Texas State Bar No. 00797715
cyeager@littler.com
Josh K. Ordiway
Texas State Bar No. 24126538
jordiway@littler.com

LITTLER MENDELSON, P.C.
2001 Ross Avenue, Suite 1500
Dallas, TX 75201
Telephone: 214.880.8100
Facsimile: 214.880.0181

**ATTORNEYS FOR DEFENDANT
DELTA AIR LINES, INC.**

CERTIFICATE OF SERVICE

I hereby certify that a copy of the foregoing document was served upon *pro se* Plaintiff Kentrez Grant on April 10, 2025, via e-mail at kentrez_78@yahoo.com and USPS at

4516 Burleson Road, #17848
Austin, Texas 78744

/s/ Josh Ordiway

Josh Ordiway